

Attorneys for Defendants

JENNIFER CHANG, by and through her parents,
NORMAN AND LINA CHANG,,

V.

CALIFORNIA SCHOOL FOR THE DEAF,
CALIFORNIA DEPARTMENT OF EDUCATION,
and FREMONT UNIFIED SCHOOL DISTRICT,

Defendants.

Case No.C06-02337 JSW

REQUEST, STIPULATION AND
~~PROPOSED~~ ORDER FOR EXTENDING
TIME FOR BRIEFING MOTIONS AND
CROSS-MOTIONS FOR SUMMARY
JUDGMENT, RESPONSIVE PLEADINGS,
AND HEARING THE MOTIONS

Case No. C 06-02337 JSW

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expert witness for the State defendants has been out of the country, and will not be available for deposition prior to the cut-off date for expert discovery, June 1, 2007, and plaintiffs' expert has been scheduled for deposition after the current date for the State defendants submitting their opening brief. If this matter cannot be resolved by settlement agreement, parties desire that the deposition testimony of these experts be available as they draft their respective motions.

The parties respectfully request that the court extend the current briefing schedule to dates commencing two weeks after the next Settlement Conference on May 30, 2007 with Magistrate Judge James, and order the following briefing schedule in lieu of that ordered on May 3, 2007:

June 13: Defendants FUSD and CSD/CDE's Motions for Summary Judgment Due.

June 27: Plaintiffs' Opposition to Defendants Motions for Summary Judgment and Plaintiffs' Cross Motion for Summary Judgment Due.

July 11: Defendants' Opposition to Plaintiffs Cross Motion for Summary Judgment and Defendants' Reply in Support of Motions for Summary Judgment due.

July 25: Plaintiffs' Reply in Support of Cross Motion for Summary Judgment due.

The hearing date for these motions will also need to be continued. All counsel are available on the following dates: August 15, 2007 and August 17, 2007.

IT IS SO STIPULATED

Dated: May 22, 2007


REBECCA FREIE
Deputy General Counsel

Attorneys for Defendants
California Department of Education and
California School for the Deaf, Fremont

Dated: May __, 2007

WILLIAM KOSKI
Youth and Education Law Project

Attorney for Plaintiffs

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Dated: May __, 2007

REBECCA FREIE

Deputy General Counsel

Attorneys for Defendants

California Department of Education and
California School for the Deaf, Fremont

Dated: May ²², 2007

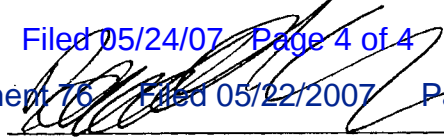
William S. Koski / by v n

WILLIAM KOSKI

Youth and Education Law Project

Attorney for Plaintiffs

Dated: May 22, 2007


DONALD A. VELEZ
Miller Brown Dannis

Attorneys for Defendant
Fremont Unified School District

[PROPOSED] ORDER

Good cause being shown, the following schedule for dispositive motions in this matter is ordered:

June 13: Defendants FUSD and CSD/CDE's Motions for Summary Judgment Due

June 27: Plaintiffs' Opposition to Defendants' Motions for Summary Judgment and

Cross Motion for Summary Judgment Due

July 11: Defendants' Opposition to Plaintiffs' Cross Motion for Summary Judgment

Defendants' Reply in Support of Summary Judgment Motions Due

July 25: Plaintiffs' Reply in Support of Cross Motion for Summary Judgment Due
9:00 a.m.

August 17, 2007 m.: Hearing

SO ORDERED.

DATED: May 24, 2007

By:


JEFFREY S. WHITE
U.S. District Judge